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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

THE STATE OF CALIFORNIA;
GAVIN C. NEWSOM, in his Official
Capacity as Governor of California;
KAREN ROSS, in her Official Capacity
as Secretary of the California
Department of Food & Agriculture;
ERICA PAN, in her Official Capacity as
Director of the California Department of
Public Health; and ROB BONTA, in his
Official Capacity as Attorney General of
California,

Defendants.

Case No. 2:25-cv-06230-MCS-AGR

**DECLARATION OF CHRIS
HOLBEIN IN SUPPORT OF
PROPOSED DEFENDANT-
INTERVENORS' UNOPPOSED
MOTION TO INTERVENE**

The Honorable Mark C. Scarsi

Date: August 25, 2025

Time: 9:00 a.m.

Location: First Street Courthouse, 350
W. 1st Street, Courtroom 7C, 7th
Floor, Los Angeles, California 90012

Trial Date: None

Action Filed: July 9, 2025

**DECLARATION OF CHRIS HOLBEIN IN SUPPORT OF PROPOSED
DEFENDANT-INTERVENORS' MOTION TO INTERVENE**

I, Chris Holbein, declare as follows:

1. I am the Director of Public Policy, Farm Animal Protection, for Humane World for Animals ("Humane World"). I have personal knowledge of the following or knowledge based upon relevant public records and information, and if called to testify, I could and would competently testify to the facts herein.

2. Humane World is a nonprofit animal protection organization headquartered in Washington, D.C., with millions of members and supporters, including almost two million members and constituents in California. Until February 2025, Humane World was known as The Humane Society of the United States ("HSUS"). While the activities described in this declaration all took place while the organization was still named the HSUS, for consistency's sake and to reflect the current name of the organization, I will use Humane World throughout.

3. Humane World's mission is to reduce animal suffering and create meaningful societal change by actively advocating against animal cruelty, working to enforce existing laws, petitioning and commenting on rulemakings before agencies like the U.S. Department of Agriculture, promoting sensible public policies, and educating the public about animal issues. As part of its mission, Humane World actively advocates against inhumane practices that harm farm animals, including veal calves, breeding pigs, and egg-laying hens. Humane World's Farm Animal Protection campaign works to inform its members and the public about the threats caused by such practices.

4. Humane World staff and its members have expended tens of thousands of hours across the United States working to further legal protections against inhumane practices that harm farm animals, including in California. In furtherance of these interests, Humane World drafted and refined the language in 2007 and 2008 that eventually became California's Proposition 2, which provided for more

1 humane treatment of farm animals in California, including egg-laying hens.

2 Humane World provided substantial financial contributions and active campaigning
3 towards the passage of Proposition 2, with Humane World's reported financial
4 contributions in support of Proposition 2 exceeding \$10 million.

5 5. Humane World was also one of the primary supporters of Assembly
6 Bill 1437 ("AB 1437"). Humane World staff and its members actively campaigned
7 for the bill's passage, to ensure that all California egg sellers would only sell more
8 humanely produced shell eggs. Humane World worked with Assemblyman Jared
9 Huffman to advance the bill; lobbied legislators; testified at bill hearings; urged
10 editorial boards to support the bill; submitted comments in support; and reached out
11 to its members and media to generate support. Humane World's staff and members
12 spent hundreds of hours in furtherance of AB 1437's eventual passage, and also
13 spent significant time in working with other stakeholders on subsequent
14 amendments to AB 1437 in 2013 (SB 667). Humane World also intervened in a
15 case challenging AB 1437 to defend its constitutionality.¹

16 6. Following passage of Proposition 2 and AB 1437, Humane World was
17 then the author and one of the primary supporters of Proposition 12, which further
18 advanced protections for humane-conscious consumers and farm animals, including
19 egg-laying hens. Humane World invested substantial organizational resources in
20 drafting the proposition, collecting ballot initiative signatures, mobilizing support
21 for its passages, defending the law as a Defendant-Intervenor in several federal
22 court challenges (one of which reached the Supreme Court),² and participating in
23 the comment periods for the state regulatory process related to Proposition 12. For
24 example, significant legal resources were expended to ensure the consistency of the

25 ¹ *Missouri v. Harris*, No. 2:14-cv-00341, Dkt. 55 (E.D. Cal. May 22, 2014)
(granting intervention).

26 ² *North Am. Meat Inst. v. Becerra*, No. 2:19-cv-08569 (C.D. Cal. Oct. 4, 2019);
27 *Iowa Pork Producers Ass'n v. Bonta*, No. 2:21-CV-09940 (C.D. Cal. Dec. 16,
28 2021); *Nat'l Pork Producers Council v. Ross*, Case No. 3:19-cv-02324 (S.D. Cal.
Dec. 5, 2019) (lower court decision in favor of Defendants affirmed in *Nat'l Pork
Producers Council v. Ross*, 598 U.S. 356 (2023)).

1 Proposition 12 with federal law, such as the division of state and federal authority
2 over the humane treatment of farm animals. The reported financial contributions by
3 Humane World in support of passage of Proposition 12 alone exceeded \$2 million.

4 7. Invalidation of Proposition 12, or AB 1437, would impede Humane
5 World's efforts to support state laws in California and elsewhere banning the sale of
6 other cruelly produced products, including shark fins, foie gras, fur, ivory and horse
7 meat. Humane World has repeatedly advocated for and defended such state laws in
8 public campaigns and courts.

9 8. With Proposition 12 secured, Humane World resources are freed up to use
10 to address other important issues and on other forms of advocacy. These resources
11 would otherwise need to be diverted back to farm animal confinement issues in
12 California should Proposition 12 be struck down.

13 9. If the Court enjoins Proposition 12 and its predecessor, AB 1437, Humane
14 World's extensive advocacy, legal, staffing, and monetary commitments to the
15 passage and preservation of Proposition 12 would be nullified. Humane World has
16 acted as both an architect and strong proponent of Proposition 12 and other
17 initiatives against inhumane practices that harm farm animals and other animals. A
18 loss of Proposition 12 for California would require Humane World to expend
19 considerable financial and human resources developing and promoting substitute
20 legislation or administrative action at the local, state and/or federal levels to address
21 these concerns about the inhumane practices regarding egg laying hens (and
22 potentially also veal calves and breeding pigs). These efforts would involve, but not
23 be limited to, reengaging in the investigative work that Humane World has
24 previously done to expose and address cruel confinement practices and reactivating
25 grassroots engagement of our members and supporters. Humane World thus has
26 direct and substantial interests in the outcome of this litigation.

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the
2 foregoing is true and correct.

3 Executed this 24th of July, 2025, in Pittsboro, North Carolina.
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Chris Holbein
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